

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO**

In re:

WILLIAM THOMAS SHEEHAN,

Debtor(s).

Under Chapter 13

Case No. 24-10271 TL

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**CHAPTER 13 TRUSTEE'S OBJECTION  
TO CONFIRMATION OF DEBTOR(S)' CHAPTER 13 PLAN**

COMES NOW, Tiffany M. Cornejo, Chapter 13 Standing Trustee and objects to the confirmation of Debtor(s)' Chapter 13 Plan. In support of thereof, Trustee states as follows:

1. **Documentation Requested by the Trustee:**  
(a) 2023 Federal and State Income Tax Returns.
2. **Part 9 of Plan:** Debtor's Chapter 13 Plan filed on March 19, 2024 (document #2) contains two (2) separate plans. Part 9 on page 6 of document #2 states allowed non-priority unsecured claims will receive "100% plus interest at the rate of 0 percent per annum" while Part 9 on page 15 of document #2 states allowed non-priority unsecured claims will receive "100% plus interest at the rate of 1 percent per annum". This must be corrected in the confirmation order.
3. **Completion:** Debtor's plan base is insufficient to pay all claims as provided for by the plan. Debtor must provide for a plan payment sufficient to pay all claims as proposed. This is based upon the fact the plan is proposing to pay 100% to all allowed claims. The claims bar date is May 28, 2024.
4. **Leave to Amend:** The chapter 13 trustee reserves the right to interpose additional objections upon the filing of any amendments to the debtor(s)' plan, schedules and statement of affairs upon the debtor(s)' providing the documentation requested above and upon the debtor(s)' providing documentation verifying income and expenses and proof of insurance.

WHEREFORE, the Chapter 13 Trustee respectfully requests that the Court deny confirmation of the Debtor(s)' plan and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/Tiffany M. Cornejo  
TIFFANY M. CORNEJO, Trustee  
Chapter 13 Standing Trustee

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was mailed to the following interested parties who have not been electronically notified this 20th day of May 2024 with the correct postage prepaid and deposited in the U.S. Mail.

William Thomas Sheehan  
5095 Kensington Way  
Las Cruces, NM 88012

/s/Tiffanie Kelly